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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
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12 In Re 17 U.S.C. § 512(h) Subpoena to
13 CLOUDFLARE, INC.

Case Number: 2:22-mc-00242

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15 **DECLARATION OF JAN VAN
16 VOORN IN SUPPORT OF
17 ISSUANCE OF SUBPOENA
18 PURSUANT TO 17 U.S.C. § 512(h)**
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21 I, Jan van Voorn, the undersigned, declare that:

22 1. I am Executive Vice President and Chief of Global Content Protection
23 for the Motion Picture Association, Inc. (“MPA”). I submit this declaration on
24 behalf of Columbia Pictures Industries, Inc., Paramount Pictures Corp., and Warner
25 Bros. Entertainment, Inc. (“ACE Members”), each of which is a member of the
26 Alliance for Creativity and Entertainment (“ACE”). ACE is a global coalition of
27 leading content creators and on-demand entertainment services committed to
28 supporting the legal marketplace for video content and addressing the challenge of

1 online piracy. The ACE Members, whether themselves or through subsidiaries and
 2 affiliates, own the copyrights in the below referenced copyrighted works.

3 2. The ACE Members (via the Motion Picture Association, Inc.) are
 4 requesting issuance of the attached proposed subpoena that would order Cloudflare,
 5 Inc. to disclose the identities, including names, physical addresses, IP addresses,
 6 telephone numbers, e-mail addresses, payment information, account updates and
 7 account histories of the users operating the following websites:

No	Domain	M3u Portal	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
1	iptvdark.com	line.da rktv- pro.m e:80	Aquaman	103.176. 90.154:8 080/live/ plav/T0d wcE5rV mlMM3 BhUkhk dldYTXJ OR0Yv U0VWa WEwWn FUVEp3 UlhseFd GDXdN WEbHV m5sclR XZGhR VDA9/1 50522	Like a Boss	103.176.90.161:8080/l ive/plav/TkZBMFIVe G9aa2R6UTNkVU5E aG9OR2RGWmtoS1 NUazRWbFo1V1hsU WNIBHBMMMDh2Vm kS1JuazJXVDA9/168 982
2	iptvfinland.me	worldi ptv.me :8080	Men In Black II	85.203.1 7.41:808 0/live/pl av/WiFo UlpURld TM05M VFRkc1 YzUm9i R1JvY21 0UE1rM XNNakl 3Y0RC MmRXe ElSbWx DV0VaT 2IwMT VORDA 9/87213	Top Gun	85.203.17.54:8080/liv e/plav/VEhCWIIvW11 NMDlhUzFFeVYZZH FRVzVaTmxBclJTCz VNvW8xY25OSWO zUiRXWE5zVkhKbG FFeDVkejA9/118949

1 3. The purpose for which this subpoena is sought is to obtain the identities
2 of the individuals assigned to these websites who have exploited ACE Members'
3 exclusive rights in their copyrighted motion pictures without their authorization.
4 This information will only be used for the purposes of protecting the rights granted
5 to ACE Members, the motion picture copyright owners, under Title II of the Digital
6 Millennium Copyright Act.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information or belief.

11 Executed at Redondo Beach, California, on December 9, 2022.

Jan van Voorn